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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S
FIFTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Fifth Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) calendar days of service hereof or no later than **January 25, 2021**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

DEFINITIONS

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

INSTRUCTIONS

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

PO Box 302799
Austin, Texas 78703
4524 Burnet Road
Austin, Texas 78756
(512) 474-1492 (voice)
(512) 474-2507 (fax)

By: /s/Alfred R. Herrera

Alfred R. Herrera
State Bar No. 09529600
aherrera@herreralawpllc.com

Brennan J. Foley
State Bar No. 24055490
bfoley@herreralawpllc.com

Sergio E. Herrera
State Bar No. 24109999
sherrera@herreralawpllc.com
service@herreralawpllc.com

**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I certify that I have served a copy of *CARD's Fifth Set of Requests for Information to SWEPCO* upon all known parties of record by electronic email, fax and/or First class mail on this the 5th day of January, 2021.

By: /s/Leslie Lindsey

Leslie Lindsey

EXHIBIT A

**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITIES ADVOCATING REASONABLE DEREGULATION'S
FIFTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 5-1. **Affiliate payroll related expenses:** Please provide the following information for each pay period in the test year for each affiliate employee group with a separate payroll annualization calculation in the Company's work papers to the extent that information is available, preferably in an Excel compatible file with fully functional formulas:
- a. number of employees
 - b. regular pay
 - c. overtime pay
 - d. compensated absences not included in b. above
 - e. incentives or bonuses
 - f. regular hours
 - g. overtime hours
- 5-2. **Affiliate payroll related expenses:** Please provide the following information for each pay period following the test year through the latest available date for each affiliate employee group with a separate payroll annualization in the Company's work papers to the extent that information is available, preferably in an Excel compatible file with fully functional formulas. Please update this response as additional pay periods become available:
- a. number of employees
 - b. regular pay
 - c. overtime pay
 - d. compensated absences not included in b. above
 - e. incentives or bonuses
 - f. regular hours
 - g. overtime hours
- 5-3. **Affiliate payroll related expenses:** Please provide the work papers the Company prepared showing the calculation of the head count adjustment found on Exhibit BJF-18 (print entire workbook).xlsx, tab 7. These work papers should include the amounts obtained directly from the Company's records, any calculations performed on that data, the resulting annualized payroll, and the calculation of the adjustment as the difference from the test year payroll, and any allocations or assignments of those amounts to SWEPCO. Please provide this response in Excel compatible format with all formulas fully functional, if available.

- 5-4. **Affiliate expense adjustments:** Please provide the work papers the Company prepared showing the calculation of each of the adjustments found on Exhibit BJF-18 (print entire workbook).xlsx other than those provided separately for the employee count adjustment. These work papers should include the amounts obtained from the Company's records, any calculations performed on that data, the resulting adjusted expense, the calculation of the adjustment, and any allocations of those amounts to SWEPCO. Please provide this response in Excel compatible format with all formulas fully functional, if available.
- 5-5. **Payroll related expenses:** Please update the response to CARD 4-6 through the latest available date.
- 5-6. **Payroll related expenses:** The file WP A-3.1 (Payroll adjustment).xlsx, tab Att 1 base rates shows annualized payroll amounts in column F rows 6 through 1461. Column K of that sheet shows percentages. Please explain if the annualized payroll amounts in column F have been adjusted for the increase percent amounts found in column K. If not, please explain how the annualized amounts in column F were calculated.
- 5-7. **Payroll related expenses:** Please provide the work papers the Company prepared showing the calculation of the annualized payroll amounts found on WP A-3.1 (Payroll adjustment).xlsx, tab Att 1 base rates, column F rows 6 through 1461. These work papers should include the amounts obtained from the Company's records, any calculations performed on that data, and the resulting annualized payroll.
- 5-8. **Affiliate payroll related expenses:** Please refer to the response to Staff 5-27, Attachment 1. Please provide the work papers the Company prepared showing the calculation of the October 2020 annualized payroll cost billed from AEPSC to SWEPCO found on Staff 5-27 Attachment 1.xlsx, column C. These work papers should include the amounts obtained directly from the Company's records, any calculations performed on that data, the resulting annualized payroll, and any allocations or assignments of those amounts to SWEPCO. Please provide this response in Excel compatible format with all formulas fully functional, if available.
- 5-9. **Payroll related expenses:** Please refer to the response to Staff 5-27, Attachment 2. Please provide the work papers the Company prepared showing the calculation of the annualized payroll amounts found on Staff 5-27 Attachment 2.xlsx, tab SWEPCO Oct 2020, column E rows 5 through 1458. These work papers should include the amounts obtained from the Company's records, any calculations performed on that data, and the resulting annualized payroll.